

United States District Court
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-000041

**ASSENTED TO MOTION TO CONTINUE AUGUST 17, 2023, SENTENCING
HEARING TO SEPTEMBER 11, 2023, AND EXTEND DEADLINE IN WHICH TO FILE
A SENTENCING MEMORANDUM/VARIANCE MOTION**

NOW COMES the defendant, Ian Freeman, by and through counsel, Mark L. Sisti, Esq. and respectfully moves this Honorable Court to Continue the August 17, 2023, Sentencing Hearing to September 11, 2023, as well as Extend the Deadline in which to File a Sentencing Memorandum/Variance with respect to this matter.

As grounds for and in support of this request, the Defendant states as follows:

1. Sentencing in this matter is currently scheduled for August 17, 2023, at 10:00AM.
2. The current deadline to file a Sentencing Memorandum/Variance Motion is August 7, 2023.
3. On or about July 28, 2023, this Court issued notification that the Court intends to grant the defendant's motion for judgment of acquittal under Rule 29 with respect to Count 3 of the Indictment alleging Money Laundering.
4. The Court's specific ruling will impact the defendant's Presentence Investigation Report as well as the content of the Sentencing Memorandum/Variance Motion to be filed by the defendant.

5. It is respectfully requested that the deadline in which to file a Sentencing Memorandum/Variance Motion be extended for two (2) weeks after the Rule 29 Order is issued.

6. The parties are available for Sentencing on September 11, 2023.

7. Defense counsel has contacted AUSA Georgiana MacDonald of the U.S. District Attorney's office, and she assents to the granting of these requests.

WHEREFORE the Defendant respectfully requests that this Honorable Court grant the following relief:

- A. Continue the August 17, 2023, Sentencing Hearing to September 11, 2023;
- B. Extend the deadline to file a Sentencing Memorandum/Variance Motion for two (2) weeks after the Rule 29 Order is issued; and
- C. For such further relief as may be just.

Respectfully Submitted,

Dated: August 2, 2023

/s/ Mark L. Sisti, Esq.
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CERTIFICATION

I hereby certify that on this 2nd day of August 2023 that a copy of the foregoing Assented to Motion to Continue August 17, 2023, Sentencing Hearing to September 11, 2023, and Extend Deadline in Which to File a Sentencing Memorandum/Variance Motion has been forwarded to Seth Aframe, Esq., Georgiana MacDonald, Esq and John Kennedy, Esq., of the U.S. District Attorney's Office, through the Court's electronic filing system.

/s/ Mark L. Sisti, Esq.
Mark L. Sisti, Esq.